

Gwendolyn Barlow  
IL ARDC # 6274519  
P.O. Box 5829  
Buffalo Grove, IL 60089  
Attorney for Raymond Ervin

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

Sarina Ervin,	)	
	)	
Petitioner,	)	Case No. 1:20-cv-06006
	)	Mag. Judge Jorge L. Alonso
	)	
	)	
vs.	)	
	)	
Raymond Ervin,	)	
Respondent.	)	

**RESPONDENT RAYMOND ERVIN'S OTHER FILING – PETITIONER  
EMAIL REQUEST IN VIOLATION OF 28 U.S. CODE § 1446(d)**

Respondent Raymond Ervin ("Raymond") hereby notifies the Court that on October 21 and October 22, 2020 Petitioner's counsel sent via email a request to conduct a citation hearing in violation of 28 U.S. Code § 1446(d), whereby upon notice of removal to State Court, completed on October 8, 2020, notifies that the State court shall proceed no further unless and until the case is remanded. Copies of emails from Petitioner's counsel and Notice of Filing of Notice of Removal to State Court are attached herein.

WHEREFORE, Respondent Raymond Ervin prays that this action be noted by the court.

Dated: October 22, 2020

By: s/Raymond N. Ervin

s/ Gwendolyn M. Barlow

Gwendolyn M. Barlow  
P.O. Box 5829  
Buffalo Grove, IL 60089  
(847) 204-0416 Phone (847) 465-1910 Facsimile  
[barlowervin727@gmail.com](mailto:barlowervin727@gmail.com)  
ARDC # 6274519  
Attorney for Raymond Ervin, Respondent

### **CERTIFICATE OF SERVICE**

This is to certify that the foregoing RESPONDENT RAYMOND ERVIN'S OTHER FILING – PETITIONER EMAIL REQUEST IN VIOLATION OF 28 U.S. CODE § 1446(d), with attachment, was e-filed through ECF and electronically served on October 22, 2020 to:

Matthew Elster  
161 North Clark Street, Suite 3000  
Chicago, IL 60601  
[mdelster@beermannlaw.com](mailto:mdelster@beermannlaw.com)

*Attorney for Petitioner*



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**RE: IRMO: Ervin [IWOV-IMAN\_ACTIVE.FID19397]**

1 message

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**Jonathan Steele** <JSteele@beermannlaw.com>

Thu, Oct 22, 2020 at 12:41 PM

To: Rosa Gutierrez <RGutierrez@beermannlaw.com>, barlowervin727@gmail.com  
<barlowervin727@gmail.com>

Cc: Jonathan Steele <JSteele@beermannlaw.com>

Ms. Barlow,

Please advise if you intend to appear for the citation exam. Thank you.

**Jonathan D. Steele** | Divorce and Family Law Partner

161 N Clark St., Suite 3000 | Chicago, IL 60601

Tel: 312.621.9700 | Fax: 312.621.0909

2275 Half Day Rd., Suite 350 | Bannockburn, IL 60015

Tel: 847.681.9600 | Fax: 847.681.0909

jsteele@beermannlaw.com | www.beermannlaw.com



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**From:** Rosa Gutierrez <RGutierrez@beermannlaw.com>

**Sent:** Wednesday, October 21, 2020 11:47 AM

**To:** barlowervin727@gmail.com

**Cc:** Jonathan Steele <JSteele@beermannlaw.com>

**Subject:** IRMO: Ervin

Good Morning Ms. Barlow,

BEERMANN LLP is inviting you to a scheduled Zoom meeting.

Topic: Ervin - Citation Examination

Time: Oct 22, 2020 02:00 PM Central Time (US and Canada)

Join Zoom Meeting

<https://beermannlaw.zoom.us/j/98822174855>

Meeting ID: 988 2217 4855

Passcode: 097043

One tap mobile

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+16465588656,,98822174855#,,,,,0#,,097043# US (New York)

Dial by your location

+1 312 626 6799 US (Chicago)

+1 646 558 8656 US (New York)

+1 301 715 8592 US (Germantown)

+1 346 248 7799 US (Houston)

+1 669 900 9128 US (San Jose)

+1 253 215 8782 US (Tacoma)

Meeting ID: 988 2217 4855

Passcode: 097043

Find your local number: <https://beermannlaw.zoom.us/j/98822174855>

**Rosa Gutierrez** | Legal Assistant

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Gwen Ervin <barlowervin727@gmail.com>

**RE: IRMO: Ervin [IWOV-IMAN\_ACTIVE.FID19397]**

Gwen Ervin <barlowervin727@gmail.com>  
To: Jonathan Steele <JSteele@beermannlaw.com>

Thu, Oct 22, 2020 at 1:27 PM

[Quoted text hidden]

 **Notice of Filing of Notice of Removal.pdf**  
29K

**IN THE CIRCUIT COURT OF THE NINETEENTH JUDICIAL CIRCUIT  
LAKE COUNTY, ILLINOIS**

SARINA ERVIN,	)	
	)	
Petitioner,	)	
	)	
vs.	)	Case No. 04 D 1943
	)	NOTICE OF FILING NOTICE OF
RAYMOND ERVIN,	)	REMOVAL IN THE UNITED STATES
	)	DISTRICT COURT FOR THE
Respondent.	)	NORTHERN DISTRICT OF ILLINOIS

**RESPONDENT'S NOTICE OF FILING OF NOTICE OF REMOVAL**

PLEASE TAKE NOTICE THAT, on October 8, 2020, Respondent Raymond Ervin filed a Notice of Removal, pursuant to 28 U.S.C § 1441(b), 1332 and 1446, removing the above captioned action from the Circuit Court of the Nineteenth Judicial Circuit Lake County Illinois to the United States District Court for the Northern District of Illinois Eastern Division. A true and correct copy of the Notice of Removal is attached hereto as Exhibit 1.

PLEASE TAKE FURTHER NOTICE that, upon filing of the Notice of Removal with the Clerk of the United States District Court for the Northern District of Illinois Eastern Division, and filing copies with the Clerk of the Circuit Court of the Nineteenth Judicial Circuit Lake County Illinois, the Respondent has effected removal and the Circuit Court shall proceed no further in this action unless and until the case is remanded pursuant to 28 U.S.C § 1446 (d).

Dated: October 8, 2020

By: s/Raymond N. Ervin

s/ Gwendolyn M. Barlow

Gwendolyn M. Barlow  
P.O. Box 5829  
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ARDC # 6274519  
Attorney for Raymond Ervin, Respondent